

TIFFANY & BOSCO
P.A.

2525 E. CAMELBACK ROAD
SUITE 300
PHOENIX, ARIZONA 85016
TELEPHONE: (602) 255-6000
FACSIMILE: (602) 255-0192

Mark S. Bosco
State Bar No. 010167
Leonard J. McDonald
State Bar No. 014228
Attorneys for Movant

12-12355

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA**

IN RE:

Elias Y. Freij and Obdulia M. Freij,
Debtors.

Nationstar Mortgage LLC,

Movant,

vs.

Elias Y. Freij and Obdulia M. Freij, Debtors; Office
of the U.S. Trustee, Trustee.

Respondents.

No. 4:12-bk-10829-EWH

Chapter 11

(Related to Docket #63)

**STIPULATION REGARDING
ADEQUATE PROTECTION**

RE: Real Property Located at
1468 E. Wedwick Street
Tucson, AZ 85706

IT IS HEREBY STIPULATED by and between the parties herein, through counsel
undersigned, that the Debtors, pay Adequate Protection Payments in the amount of \$466.54 a month

1 commencing on December 1, 2012. The funds are intended to serve as adequate protection for
2 Debtors' lien obligation to Movant secured by the real property described as:

3 Lot 11, of ARROYO VISTA, according to the Plat of Record in the Office of the County
4 Recorder of Pima County, Arizona Recorded in Book 56 of Maps, Page 57

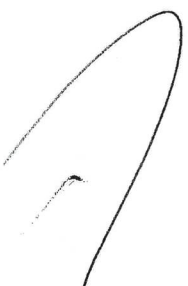
5 IT IS FURTHER STIPULATED that the debtors will make all Adequate Protection payments
6 directly to the office of Tiffany & Bosco, P.A. no later than the first of every month starting with the
7 December 1, 2012 payment.

8 IT IS FURTHER STIPULATED that this stipulation is for adequate protection payments
9 only. The parties hereto reserve all rights and defenses including proof as to being the current lien
10 holder on the real property described herein. Additionally, the parties acknowledge that the adequate
11 protection payments provided herein shall be applied pursuant to further Order from the Court.

12 IT IS FURTHER STIPULATED that in the event Debtors default on this adequate protection
13 stipulation, the matter will be set for hearing.

14 IT IS FURTHER STIPULATED that the Motion for Relief from the Automatic Stay hearing
15 set for December 6, 2012 is vacated.

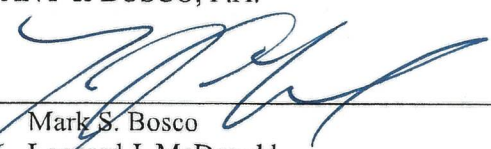
16
17 DATED this December 4th day of 2012.

18
19
20
21
22
23
24
25
26


Eric Slocum Sparks
Attorney for Debtors

TIFFANY & BOSCO, P.A.

By



Mark S. Bosco
Leonard J. McDonald
Attorneys for Movant